



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1868

AUG - 4 2011

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

J. David McNichol  
ISP Environmental Services, Inc.  
1361 Alps Road, Bldg. 8-3  
Wayne, New Jersey 07470

Re: LCP Chemical Superfund Site - Bill for Collection No 2721126S030

Dear Mr. McNichol:

Please find enclosed a Bill for Collection, #2721126S030, which was prepared by the U.S. Environmental Protection Agency (EPA), Region 2, for recovery of EPA response costs for the LCP Chemicals, Inc. Superfund Site (Site) under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. §9601, et seq. This Bill for Collection is issued to you pursuant to Section XX, paragraph 76 of the Administrative Order on Consent ("AOC") Index No. II-CERCLA-02-99-2015, signed by EPA and ISP Environmental Services, Inc. ("ISP"). Attachment A to this letter is an itemized cost summary and narrative statement for response costs incurred during the time period July 1, 2010 to June 30, 2011.

Please refer to the Superfund Cost Recovery Package Imaging and On-Line System (SCORPIOS) report, covering the period July 1, 2010 to June 30, 2011, also enclosed with this letter for your review. EPA reserves the right to recover costs incurred during the time period covered by this bill, but which have not been included in this bill.

Pursuant to Section XX, paragraph 76 of the AOC, you are responsible for remitting payment in the amount of \$52,271.71 within 30 days from receipt of the enclosed bill via electronic funds transfer (EFT), as specified below.

You must instruct your bank to remit payment via EFT to EPA's account Federal Reserve Bank of New York, including the following information:

- i. EFT to be directed to: **Federal Reserve Bank of New York**
- ii. Bank routing number: **021030004**
- iii. Bank account number receiving payment: **68010727**

259246



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- iv. SWIFT address: **FRNYUS33**
- v. Address: **Federal Reserve Bank of New York**  
**33 Liberty Street**  
**New York, NY 10045**
- vi. Field Tag 4200 of the Fedwire message to read:  
**D 68010727 Environmental Protection Agency**
- vii. Case Number: **II-CERCLA-02-99-2015**
- viii. Amount of payment: **\$52,271.71**
- ix. Name of Remitter: **ISP Environmental Services, Inc**
- x. Site/Spill identifier: **02 - HU**

To ensure that your payment is properly recorded, you should send a letter, within one week of the EFT, which references the date of the EFT, the payment amount, the name of the site, the case number, and your name and address to:

**Jon Gorin**  
**Remedial Project Manager**  
**New Jersey Remediation Branch**  
**Emergency & Remedial Response Division**  
**290 Broadway, 19th Floor**  
**New York, NY, 10007-1866**  
**E-mail: gorin.jonathan@epa.gov**

as well as to:

**Frank Cardiello**  
**Assistant Regional Counsel**  
**Office of Regional Counsel**  
**290 Broadway, 17th Floor**  
**New York, NY, 10007-1866**  
**E-mail: cardiello.frank@epa.gov**

and

**Richard Rice**  
**U.S. EPA**  
**26 W. Martin Luther King Drive**  
**Attention: FINANCE**  
**MS: NWD**  
**Cincinnati, Ohio 45268**  
**E-mail (to both): rice.richard@epa.gov and AcctsReceivable.CINWD@epa.gov**

EPA reaffirms its commitment to conduct appropriate and cost-effective oversight of work performed by consenting parties while ensuring protective cleanups. To this end, EPA would once again like to offer to discuss with you its plans for the oversight of ongoing work at the Site, and to provide you with the opportunity to suggest ways to effectively streamline the work and its oversight.

If you are interested in discussing work at the Site, or if you have questions regarding this Bill for Collection, please contact Jon Gorin at (212) 637-4361. Legal inquiries should be directed to Mr. Frank Cardiello, Assistant Regional Counsel, at (212) 637-3148.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Carole Petersen".

Carole Petersen, Chief  
New Jersey Remediation Branch

Enclosure

Summary of Response Costs Paid by EPA  
from 07/01/2010 through 06/30/2011  
LCP Chemicals Inc. Superfund Site, Linden, NJ

**Payroll:**

This consists of direct EPA personnel charges for time spent by EPA employees in, among other activities, reviewing and commenting on deliverables and overseeing Settling Defendants adherence to the requirements of the AOC. See attached Payroll section (regional) of EPA's Itemized Cost Summary for the time period 07/01/2009 through 06/30/2010.

Total Payroll Costs: \$18,889.99

**Response Action Contract (RAC)**

This item consists of costs paid by EPA in connection with work performed by Camp, Dresser & McKee (CDM) for oversight of ISP's performance of the work required under the AOC.

CDM Costs: \$342.35

**Response Action Contract – (RAC)2**

This item consists of costs paid by EPA in connection with work performed by Camp, Dresser & McKee (CDM) for oversight of ISP's performance of the work required under the AOC.

CDM Costs: \$18,498.05

**Indirect Costs:**

Indirect costs are those costs which are necessary to the operation of the Superfund program and the support of site cleanup efforts, but which cannot be directly tied to the efforts at any one site. Indirect costs are allocated to particular Superfund sites by means of a methodology established by EPA Headquarters. See attached worksheet for calculation of indirect costs.

Total Indirect Costs: \$14,541.32

TOTAL EPA COSTS: \$52,271.71

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## Narrative Cost Summary

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

1. The United States Environmental Protection Agency has incurred at least \$18,889.99 for Regional Payroll Costs.
2. The United States Environmental Protection Agency has incurred costs of at least \$342.35 for RESPONSE ACTION CONTRACT (RAC) contract expenditures. The total represents the amount spent under the CDM FEDERAL PROGRAMS CORP. contract.
3. The United States Environmental Protection Agency has incurred costs of at least \$18,498.05 for RESPONSE ACTION CONTRACT - 2 contract expenditures. The total represents the amount spent under the CDM FEDERAL PROGRAMS CORPORATION contract.
4. The United States Environmental Protection Agency has incurred at least \$14,541.32 for Indirect Costs.

**Total Site Costs:**

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\$52,271.71

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## Itemized Cost Summary

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

<b>REGIONAL PAYROLL COSTS .....</b>	<b>\$18,889.99</b>
<b>RESPONSE ACTION CONTRACT (RAC)</b>	
CDM FEDERAL PROGRAMS CORP. (68-W9-8210) .....	\$342.35
<b>RESPONSE ACTION CONTRACT - 2</b>	
CDM FEDERAL PROGRAMS CORPORATION (EPW09002) .....	\$18,498.05
<b>EPA INDIRECT COSTS .....</b>	<b>\$14,541.32</b>
<b>Total Site Costs:</b>	<b>\$52,271.71</b>

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## Regional Payroll Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
BENROUBI, ALBERT J.	2010	22	3.00	173.50
			3.00	\$173.50
CARDIELLO, FRANK	2010	20	1.50	116.60
		21	3.50	272.06
		22	22.25	1,768.84
		23	6.50	505.25
		24	4.00	310.93
		25	6.25	485.80
		26	4.50	349.78
		27	3.25	252.64
	2011	01	1.00	77.73
		02	2.25	167.85
		04	6.25	463.66
		05	1.25	92.73
		06	6.75	500.75
		08	1.50	117.12
		09	0.25	19.51
		10	2.25	175.67
		11	12.75	995.52
		12	2.75	214.73
		13	0.25	19.52
		14	1.50	120.38
		16	2.00	160.50
		17	0.75	60.18
		18	1.75	140.43
		19	1.25	100.31
			96.25	\$7,488.49
GORDON, MICHAEL T.	2010	22	5.00	165.33
			5.00	\$165.33
GORIN, JONATHAN M.	2010	21	1.00	75.81
		22	6.00	465.21
		23	8.00	606.52
		24	7.00	530.70
		25	2.00	151.63
		26	11.00	833.96



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## Regional Payroll Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
GORIN, JONATHAN M.	2010	27	2.00	151.19
	2011	01	2.00	151.99
		02	3.00	228.30
		03	11.00	837.12
		04	12.00	905.54
		05	8.00	581.46
		06	16.00	1,162.92
		08	2.00	152.88
		13	2.00	152.88
		14	10.00	764.38
		15	1.00	76.43
		18	3.00	229.31
			107.00	\$8,058.23
MICHAEL, ADLY	2011	18	1.75	103.04
		19	1.00	58.87
			2.75	\$161.91
ROONEY, JAMES P.	2010	21	1.50	124.33
	2011	12	0.50	41.53
			2.00	\$165.86
SMITH, LORA	2010	20	1.50	71.19
		22	0.50	28.57
		23	1.00	56.35
	2011	02	2.50	141.02
		03	1.50	84.60
		12	0.50	28.26
			7.50	\$409.99
SY, WILLIAM L.	2010	21	28.00	1,586.68
		23	11.00	623.33
		27	1.00	56.67
			40.00	\$2,266.68
Total Regional Payroll Costs			263.50	\$18,889.99

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## Contract Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

RESPONSE ACTION CONTRACT (RAC)

Contractor Name: CDM FEDERAL PROGRAMS CORP.  
EPA Contract Number: 68-W9-8210  
Project Officer(s): GOTTESMAN, JUSTIN  
Dates of Service: From: 12/29/2007 To: 01/05/2009  
Summary of Service: RESPONSE ACTION CONTRACT-SUBCLASS(REDI)  
Total Costs: \$342.35

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>	<u>Annual Allocation</u>
577	11/19/2010	71,233.58	11250 12/21/2010	965.33	48.63
580	05/11/2011	322.45	11830 06/08/2011	8.73	0.44
JVL2664	06/28/2011	0.00	02664 06/28/2011	-648.13	-32.65
Total:				<u>\$325.93</u>	<u>\$16.42</u>

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## Contract Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

RESPONSE ACTION CONTRACT (RAC)

Contractor Name: CDM FEDERAL PROGRAMS CORP.  
EPA Contract Number: 68-W9-8210  
Project Officer(s): GOTTESMAN, JUSTIN  
Dates of Service: From: 12/29/2007 To: 01/05/2009  
Summary of Service: RESPONSE ACTION CONTRACT-SUBCLASS(REDI)  
Total Costs: \$342.35

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<u>Voucher Number</u>	<u>Schedule Number</u>	<u>Rate Type</u>	<u>Annual Allocation Rate</u>
577	11250	Provisional	0.050378
580	11830	Provisional	0.050378
JVL2664	02664	Provisional	0.050378

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## Contract Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

RESPONSE ACTION CONTRACT - 2

Contractor Name: CDM FEDERAL PROGRAMS CORPORATION

EPA Contract Number: EPW09002

Project Officer(s): ENG, HELEN  
ROSADO, FERNANDO  
STATES, ABBEY

Dates of Service: From: 05/29/2010 To: 04/30/2011

Summary of Service: RESPONSE ACTION CONTRACT-SUBCLASS(REDI)

Total Costs: \$18,498.05

Voucher Number	Voucher Date	Voucher Amount	Treasury Schedule Number and Date	Site Amount
16-3320	06/18/2010	571,622.37	00880 07/14/2010	3,296.60
17-3320	07/19/2010	1,009,420.96	090995 08/19/2010	1,019.31
18-3320	08/19/2010	528,353.47	00A92 09/16/2010	1,453.40
19-3320	09/17/2010	1,086,998.82	01039 10/14/2010	1,276.01
20-3320	10/19/2010	965,626.46	01146 11/18/2010	2,006.33
21-3320	11/18/2010	652,667.96	01225 12/14/2010	1,046.47
22-3320	12/20/2010	551,078.30	01347 01/20/2011	1,017.88
23-3320	01/19/2011	756,206.69	01447 02/18/2011	1,223.71
24-3320	02/10/2011	588,533.22	01565 03/22/2011	1,862.60
25-3320	03/17/2011	902,834.17	01667 04/19/2011	2,025.86
26-3320	04/18/2011	1,100,640.31	01764 05/17/2011	1,584.29
28-3320	05/19/2011	858,532.05	01868 06/16/2011	685.59
Total:				<u>\$18,498.05</u>

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## EPA Indirect Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

<u>Fiscal Year</u>	<u>Direct Costs</u>	<u>Indirect Rate( %)</u>	<u>Indirect Costs</u>
2010	15,532.18	38.54%	5,986.12
2011	22,198.21	38.54%	8,555.20
	<u>37,730.39</u>		
Total EPA Indirect Costs			<u>\$14,541.32</u>

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## EPA Indirect Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
BENROUBI, ALBERT J.	2010	22	173.50	38.54%	66.87
			173.50		\$66.87
CARDIELLO, FRANK	2010	20	116.60	38.54%	44.94
		21	272.06	38.54%	104.85
		22	1,768.84	38.54%	681.71
		23	505.25	38.54%	194.72
		24	310.93	38.54%	119.83
		25	485.80	38.54%	187.23
		26	349.78	38.54%	134.81
		27	252.64	38.54%	97.37
			4,061.90		\$1,565.46
GORDON, MICHAEL T.	2010	22	165.33	38.54%	63.72
			165.33		\$63.72
GORIN, JONATHAN M.	2010	21	75.81	38.54%	29.22
		22	465.21	38.54%	179.29
		23	606.52	38.54%	233.75
		24	530.70	38.54%	204.53
		25	151.63	38.54%	58.44
		26	833.96	38.54%	321.41
		27	151.19	38.54%	58.27
			2,815.02		\$1,084.91
ROONEY, JAMES P.	2010	21	124.33	38.54%	47.92
			124.33		\$47.92
SMITH, LORA	2010	20	71.19	38.54%	27.44
		22	28.57	38.54%	11.01

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## EPA Indirect Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
SMITH, LORA	2010	23	56.35	38.54%	21.72
			156.11		\$60.17
SY, WILLIAM L.	2010	21	1,586.68	38.54%	611.51
		23	623.33	38.54%	240.23
		27	56.67	38.54%	21.84
			2,266.68		\$873.58
Total Fiscal Year 2010 Payroll Direct Costs:			9,762.87		\$3,762.63

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
EPW09002	16-3320	07/14/2010	3,296.60	0.00	38.54%	1,270.51
	17-3320	08/19/2010	1,019.31	0.00	38.54%	392.84
	18-3320	09/16/2010	1,453.40	0.00	38.54%	560.14
			5,769.31	0.00		\$2,223.49
Total Fiscal Year 2010 Other Direct Costs:			5,769.31	0.00		\$2,223.49
Total Fiscal Year 2010:			15,532.18			\$5,986.12

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
CARDIELLO, FRANK	2011	01	77.73	38.54%	29.96
		02	167.85	38.54%	64.69
		04	463.66	38.54%	178.69

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## EPA Indirect Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
CARDIELLO, FRANK	2011	05	92.73	38.54%	35.74
		06	500.75	38.54%	192.99
		08	117.12	38.54%	45.14
		09	19.51	38.54%	7.52
		10	175.67	38.54%	67.70
		11	995.52	38.54%	383.67
		12	214.73	38.54%	82.76
		13	19.52	38.54%	7.52
		14	120.38	38.54%	46.39
		16	160.50	38.54%	61.86
		17	60.18	38.54%	23.19
		18	140.43	38.54%	54.12
		19	100.31	38.54%	38.66
			<u>3,426.59</u>		<u>\$1,320.60</u>
GORIN, JONATHAN M.	2011	01	151.99	38.54%	58.58
		02	228.30	38.54%	87.99
		03	837.12	38.54%	322.63
		04	905.54	38.54%	349.00
		05	581.46	38.54%	224.09
		06	1,162.92	38.54%	448.19
		08	152.88	38.54%	58.92
		13	152.88	38.54%	58.92
		14	764.38	38.54%	294.59
		15	76.43	38.54%	29.46
		18	229.31	38.54%	88.38
			<u>5,243.21</u>		<u>\$2,020.75</u>
MICHAEL, ADLY	2011	18	103.04	38.54%	39.71
		19	58.87	38.54%	22.69
			<u>161.91</u>		<u>\$62.40</u>



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## EPA Indirect Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
ROONEY, JAMES P.	2011	12	41.53	38.54%	16.01
			41.53		\$16.01
SMITH, LORA	2011	02	141.02	38.54%	54.35
		03	84.60	38.54%	32.60
		12	28.26	38.54%	10.89
			253.88		\$97.84
Total Fiscal Year 2011 Payroll Direct Costs:			9,127.12		\$3,517.60

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
68-W9-8210	577	12/21/2010	965.33	48.63	38.54%	390.78
	580	06/08/2011	8.73	0.44	38.54%	3.53
	JVL2664	06/28/2011	-648.13	-32.65	38.54%	-262.37
			325.93	16.42		\$131.94
EPW09002	19-3320	10/14/2010	1,276.01	0.00	38.54%	491.77
			1,276.01	0.00	38.54%	491.77
			-1,276.01	0.00	38.54%	-491.77
	20-3320	11/18/2010	2,006.33	0.00	38.54%	773.24
	21-3320	12/14/2010	1,046.47	0.00	38.54%	403.31
	22-3320	01/20/2011	1,017.88	0.00	38.54%	392.29
	23-3320	02/18/2011	1,223.71	0.00	38.54%	471.62
	24-3320	03/22/2011	1,862.60	0.00	38.54%	717.85
	25-3320	04/19/2011	2,025.86	0.00	38.54%	780.77
	26-3320	05/17/2011	702.00	0.00	38.54%	270.55
			882.29	0.00	38.54%	340.03

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## EPA Indirect Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

Costs are from 07/01/2010 - 06/30/2011 (PP20FY10 - PP19FY11)

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
EPW09002	28-3320	06/16/2011	685.59	0.00	38.54%	264.23
			12,728.74	0.00		\$4,905.66
Total Fiscal Year 2011 Other Direct Costs:			13,054.67	16.42		\$5,037.60
Total Fiscal Year 2011:			22,198.21			\$8,555.20
Total EPA Indirect Costs						\$14,541.32